

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

KATYRECE S. HALL,)	
)	
PLAINTIFF,)	
)	
v.)	CASE #:2:06-cv-00588-MEF-VPM
)	
LEONARD ROSS CRANE,)	
MAYTAG SALES, .INC., and)	
fictitious parties A - D,)	
)	
DEFENDANTS.)	

MOTION TO AMEND ANSWER

COME NOW the Defendants and herewith move this Court to allow them to amend their Answer by adding thereto that defense which is set out in Defendants' Amended Answer contemporaneously with this Motion. As grounds, the Defendants show that the Amendment is within the time allowed by the Court and is meritorious.

WHEREFORE, THESE PREMISES PRAYED, the Defendants move this Court to allow them to amend their Answer by adding said defense.

/s/ *Randall Morgan*
RANDALL MORGAN [8350-R70R]
ELIZABETH BRANNEN CARTER
Attorneys for Defendants Maytag Sales, Inc.
and Leonard Ross Crane
HILL, HILL, CARTER, FRANCO, COLE & BLACK, P.C.
Post Office Box 116
Montgomery, Alabama 36101-0116

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document via electronic filing, first-class postage prepaid, on this the 14th day of November, 2006:

Carol Gerard, Esq.
Andy Nelms, Esq.
Law Offices of Jay Lewis, LLC
P O BOX 5059
Montgomery, AL 36103

/s/ *Randall Morgan* OF
COUNSEL